APR 2 9 1999.

NORMAN WAIN & ASSOCIATES

Federal Communications Commission

Office of Secretary Tower East Suite 600

20600 Chagrin Boulevard

Shaker Heights, Ohio 44122 Telephone 216-491-3880

Facsimile 216-491-3806

DOCKET FILE COPY ORIGINAL

Friday, March 26, 1999

Mass Media Bureau, Policy and Rules Division Federal Communications Commission 1919 M Street NW Washington, D.C. 20554

In the Matter Of

MM Docket No. 99-25

Ownership qualifications and power of proposed low-power FM Radio Stations

Comments of Norman Wain on behalf of the Jewish Community Federation of Cleveland, Ohio

The Jewish Community Federation of Cleveland, Ohio believes that the proposal under consideration to create a new class of low-powered FM radio stations can be of great value to public service organizations who have no profit-making or commercial agenda.

In the hands of community-service organizations we believe that these frequencies can play a vital role in distributing information to clients who often are too youg, too old, too handicapped or too feeble to react properly to mailed or phoned information.

With the rapid advent of e-mail and other forms of communications which utilize computers and the internet we are mindful of the fact that a large segment of the population which relies on social service agencies has no access to this form of media. Studies indicate however, that this population, along with the general population has easy access to fm receivers.

In the hands of operators such as schools, welfare origanizations, The Society For The Blind, Family Service agencies and etc the valuable spectrum would be devoted to it's highest public-service use.

No. of Copies rec'd

In the case of the Federation (which intends to apply for a frequency which may be allocated to Cleveland) our broadcast time would be devoted to agencies like the aformentioned plus educational, cultural, and social organizations within the Jewish community who have the added responsibility of sustaining the ancient values of the Jewish people.

To accomplish this service we would recommend that the Commission seriously think about 1000 watts of power and 60 metres of height specifications which would produce signals that cover a minimum of 8.8 miles in every direction from the transmitting tower.

In most urban areas this would be the minimum coverage needed which would enable public service organizations to realize their mission.

Submitted by:

Norman Wain

20600 Chagrin Blvd #600 Shaker Heights, OH 44122